

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Kim Diane Handy Jones, as Trustee for the
next of kin of Cordale Quinn Handy,

Civil File No. 20-cv-00707 DSD/ECW

Plaintiff,

vs.

**DEFENDANTS' MOTIONS
IN LIMINE FOR
RETRIAL OF DAMAGES PHASE**

City of St. Paul, Minnesota; St. Paul Police
Officer Nathaniel Younce, in his individual
and official capacities,
Defendants.

TO: Plaintiff Kim Diane Handy Jones and her attorneys, Kevin O'Connor, O'Connor Law Firm, Ltd., 100 S. Wacker Drive, Suite 350, Chicago, Illinois 60606, and Paul Bosman, Chief Counsel, CUAPB Litigation Unit, 2136 Ford Parkway #5328, Saint Paul, Minnesota 55116.

Defendants City of Saint Paul and Nathaniel Younce move the Court for the following relief:

1. An Order prohibiting Plaintiff, her counsel and any witness from eliciting or presenting testimony, documentary evidence, information, allegations, or argument which is intended to ask the jury to place themselves in the position of the Plaintiff; i.e., "Golden Rule" or "Reptile Theory" arguments and evidence.

2. An Order prohibiting Plaintiff, her counsel and any witness from eliciting or presenting testimony, documentary evidence, information, allegations, or argument regarding the punitive damages award previously adjudged in this matter.

3. An Order clarifying that Judge Doty's previous rulings regarding defense motions in limine (filed at Docs. 82-84), and decided by Judge Doty at the pretrial conference on July 23, 2023 continue to apply to the retrial of the damages phase of this case.

Dated: September 12, 2024

Respectfully submitted,

LYNDSEY M. OLSON
City Attorney

/s/ Anthony G. Edwards

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